

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Ronaldo Ligons, et al.,

Court File No. 15-CV-2210 (PJS/BRT)

Plaintiffs,

vs.

**DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

Minnesota Department of Corrections, et al.,

Defendants.

TO: PLAINTIFFS Ronaldo Ligons and Barry Michaelson, and their attorneys, Peter J. Nickitas, Peter J. Nickitas Law Office, L.L.C., 431 South Seventh Street, Suite 2446, Minneapolis, Minnesota 55415 and C. Peter Erlinder, 1043 Grand Ave, Suite 228, St. Paul, Minnesota 55105.

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendants hereby move the court for an order as follows:

Granting Defendants Minnesota Department of Corrections, Commissioner Thomas Roy, Dr. David A. Paulson, M.D., and Nanette Larson summary judgment and dismissing all claims in the Second Amended Complaint with prejudice.

This motion is made pursuant to Rule 56 of the Federal Rules of Civil Procedure, and upon a memorandum of law and any supporting documents filed in accordance with Local Rules.

Signature on page 2

Dated: March 28, 2017

OFFICE OF THE ATTORNEY GENERAL
State of Minnesota

s/ **Kathryn A. Fodness**

KATHRYN A. FODNESS
Assistant Attorney General
Atty. Reg. No. 0392184

KELLY S. KEMP
Assistant Attorney General
Atty. Reg. No. 0220280

IAN WELSH
Assistant Attorney General
Atty. Reg. No. 0396287

445 Minnesota Street, Suite 1100
St. Paul, Minnesota 55101-2128
(651) 757-1348 (Voice)
(651) 296-1410 (TTY)
kathryn.fodness@ag.state.mn.us
kelly.kemp@ag.state.mn.us
ian.welsh@ag.state.mn.us

ATTORNEYS FOR DEFENDANTS
MINNESOTA DEPARTMENT OF
CORRECTIONS, ROY, PAULSON, AND
LARSON